

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF MOTION FOR RECONSIDERATION OR, IN THE
ALTERNATIVE, TO CERTIFY THIS MATTER FOR INTERLOCUTORY
APPEAL**

PLEASE TAKE NOTICE that on January 16, 2023, or as soon thereafter as counsel may be heard, the undersigned Defendants' counsel, on behalf of all Defendants named below, shall move for an entry of Order reconsidering the Court's denial of Defendants' motions to exclude Plaintiffs' experts' general causation opinions, or, in the alternative, to certify this issue for interlocutory appeal.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned Defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: December 20, 2022

Respectfully submitted,

By: /s/ Jessica Davidson Miller

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 20, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson Miller

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